



FEMA Requirement A6: Continued Plan Maintenance

Is there a description of the method and schedule for keeping the plan current (monitoring, evaluating and updating the mitigation plan within a 5-year cycle)?

Local Mitigation Plan Review Guide, FEMA, 2011, page 17

This “Good Practice” document is intended to help planners understand the FEMA requirement to discuss within the plan how the community will maintain the plan through monitoring, evaluating and updating within a five-year cycle.

Common Reasons Why FEMA Returns Plans for A6 Revisions

1. A process is not described for plan maintenance to monitor, evaluate, and update the current plan covering all three considerations: how, when, and by whom the process will be conducted.
2. Plan evaluation is misunderstood and/or confused with monitoring. Monitoring is concerned with tracking status and progress toward completing planned actions. Evaluation considers the overall effectiveness of the mitigation strategy in reducing identified vulnerabilities.

Tip: Identify a system during implementation for tracking completed work and what remains to be done. Indicate if completion stages will be determined, and how mid-course correction measures and other issues will be identified.

Note: For a sample worksheet that can be used to track progress on mitigation actions, see page A-35 of FEMA’s Local Mitigation Handbook, which is also included as an attachment to this guide.

Tip: Identify specific evaluation criteria that responsible parties will use to measure plan effectiveness in achieving plan goals to reduce identified vulnerabilities.

For instance, assess the effectiveness of the planning process, public and stakeholder involvement, the acquisition and review of new information, the risk analysis, the mitigation strategy including its implementation, and plan maintenance. Indicate how mid-course corrections will be made.

Note: For a sample worksheet to assist in developing evaluation criteria for

the plan, see pages A-37 and A-38 of FEMA's Local Mitigation Handbook, that is also included as an attachment to this guide.

3. A schedule for each stage of plan maintenance was not included.

Tip: Describe how often and when monitoring and assessment will occur. Provide a start date and bench marks for updating the plan. Explain when the current plan expires.

Tip: Plan to begin the update process at least a year before the current plan is scheduled to expire; add another year if grant funding will be pursued to support the process.

4. A specific position, department or agency is not identified as responsible for each stage (monitoring, evaluation, and update).

Tip: Designate a specific position rather than an agency or department to be responsible for overall plan maintenance to promote accountability.

Plans Demonstrating Good Practice for Requirement A6

This section provides two examples documenting the method and schedule by which a community will maintain its mitigation plan during the 5-year plan cycle. These abstracts are intended to illustrate good practices in meeting the requirements.

Each abstract is preceded by a brief explanation of why this plan section meets the requirements. In addition, practices going "Beyond Minimum Requirements" are noted. Many other approaches are possible, so don't be limited by these examples; the approach taken should fit the particular circumstances of the community.

Example 1: *Abstract from Single Jurisdiction Hazard Mitigation Plan 2015*

Why This Plan Demonstrates Good Practice

1. Specific activities and criteria are described to monitor and evaluate the plan's implementation throughout the plan's five-year cycle. The plan update process is explained as comprised of named events and actions.
2. A schedule clearly states dates for starting, continuing, and/or finishing the maintenance tasks and events within the five-year cycle.
3. The description of plan maintenance is sufficiently detailed, so that (existing and new) town officials, staff, and HM Planning Committee members will know how to plan ahead and carry out each phase.

4. The Town Director of Planning as the head of the HM Planning Committee is identified as responsible for initiating each maintenance stage – monitoring, evaluation, and update.
5. **Beyond Minimum Requirements.**
 - a. The town adoption, state agency role, and FEMA approval process are generally described.
 - b. A process is determined for monitoring, evaluating, and updating the plan during and after a significant event or disaster(s).
 - c. A detailed process for the 5-year update is provided which considers the strengths and challenges of the previous plan approval process, addressing such matters as lessons learned and best practices.
 - d. The update description includes recommendations for the next plan update.

See Abstract on following pages.

Abstract from***Single Jurisdiction Hazard Mitigation Plan 2015*****Annual Review**

The HM Planning Committee*, convened by the Director of Planning, will hold an annual public meeting to monitor and assess implementation of the 2015 HM plan during May of each year from 2015 to 2020. This process will involve evaluating progress, difficulties, and potentially changes to the original proposals. These annual reviews will also allow the town to develop related grant applications.

Individuals and organizations may provide input by addressing the Committee at these meetings or by submitting email comments to the Director of Planning. Public notices for each upcoming review meeting will be posted at the town hall, on the municipal website, on the local public access cable channel, and in a local newspaper. Email comments will also be solicited on the same public notices. Hard copies of the 2015 plan are available for review at the town planning office and public library. Minutes of HM Planning Committee meetings will be posted on the town website.

The Department head responsible for each mitigation activity within the 2015 plan will submit a description of project status for the annual meeting. The descriptions will be shared with meeting attendees for discussion. The Committee will consider public input when recommending modifications to mitigation activities.

Table 10: HMP Implementation Contacts

Municipal Official	Phone/email
Director of Planning	(XXX) XXX-XXXX; DirPlanning@town.state.gov
Emergency Mgt. Director	(XXX) XXX-XXXX; EMD@town.state.gov
Public Works Superintendent	(XXX) XXX-XXXX; DPWsup@town.state.gov
Fire Chief	(XXX) XXX-XXXX; FDchief@town.state.gov
Zoning Board	(XXX) XXX-XXXX; ZoningB@town.state.gov

The following components will be reviewed at each spring meeting.

- Assess progress of plan implementation, including mitigation measures completed or in progress, and identify activities not begun.
- Identify impediments to completion of mitigation actions, and any utilized or proposed solutions.
- Identify and evaluate specific sites and areas vulnerable to natural hazards, including any locations not included in the current plan.
- Identify additional mitigation measures to benefit these areas.
- Monitor current effectiveness of past completed mitigation strategies and identify successes, inadequacies, and lessons learned.
- Review and adjust overall goals, priorities, mitigation strategies, and public involvement strategies (as needed).

Annual Report

A written summary of Committee analysis and recommendations will be prepared and submitted to the Board of Selectmen following each annual meeting. Each year's summary

Abstract from***Single Jurisdiction Hazard Mitigation Plan 2015*****(Continued)**

will be publically available on the municipal website during the plan's five year period, and shall be utilized in updating the plan update during the plan's fourth year. Public participation during the plan update will be undertaken as described in the next section.

Next Plan Update

The Director of Planning, as head of the HM Planning Committee, will initiate an update of the 2015 Hazard Mitigation plan beginning at the annual Committee meeting publicly held in May 2018. This start date is necessary to ensure sufficient time for completion before the Plan expires in April 2020. Public comments may be submitted throughout the evaluation and update process to the Planning Director, whose email address will be publicized to collect this input.

In 2018, the Committee will develop a questionnaire about concerns on natural hazard risks and vulnerabilities and past mitigation goals and strategies to determine if plan focus and priorities should change. This survey shall be distributed in September 2018 by mail or email to town residents, businesses, community organizations, state officials of managing agencies, and officials of other municipalities (adjacent and within local watersheds). Additional outreach to other yet-to-be-identified stakeholders may be undertaken.

During the May 2019 annual meeting, Committee members appointed by the Board of Selectmen will first complete the yearly monitoring and evaluation, followed by a public review of that information, previous annual summaries, and questionnaire results. Such background information will be posted on the municipal website, along with the 2015 plan. Public notice of this meeting will be placed on the town website, as a legal ad within a local newspaper, and posted at the town hall.

A first update draft shall then be developed incorporating new data, collected input, and the Committee's recommendations. The draft will be available for public review from July to September 2019 on the municipal website, at the Town Planning office and at the public library. A subsequent public hearing and presentation during a Board of Selectmen's meeting in September 2019 is planned to allow for additional comment and adjustments.

During October 2019, a revised draft shall be posted on the town website and hard copies placed at the Town Planning office and town library.

Town Adoption and FEMA Approval

In October 2019, the HM Planning Committee will seek the consent of the Board of Selectmen to forward a finalized draft for review to the state agency, MEMA. Any recommendations made by state officials shall be acted on, and the amended plan sent to MEMA for submittal to FEMA.

The Board of Selectmen officially adopt the updated plan for the Town on receiving a letter of Approval Pending Adoption (APA) from FEMA. The town adoption certificate along with the final 2020 plan are to be resubmitted together directly to FEMA for final federal approval.

Example 2: Multi-Jurisdiction Local Hazard Mitigation Plan 2015, section for one participating municipality**Why This Plan Demonstrates Good Practice**

1. Specific activities and criteria are described to monitor and evaluate the plan's implementation throughout the plan's five-year cycle. The plan update process is explained as comprised of named events and actions.
2. A schedule clearly states a date for starting, continuing, and/or finishing the maintenance tasks and events within the five-year cycle.
3. The Town Emergency Management Director as the head of the HM Planning Committee is identified as responsible for initiating each maintenance stage – monitoring, evaluation, and update. “Responsible Parties” identified elsewhere in the mitigation strategy execute and report progress on the associated activities.
4. The description of plan maintenance is sufficiently detailed, so that (existing and new) town officials, staff, and HM Planning Committee members will know how to plan ahead and carry out each phase.
5. The description reflects the processes for the town, which may vary from those in other communities participating in this multi-jurisdictional plan.

See Abstract on following pages.

Abstract from***Multi-jurisdictional Hazard Mitigation Plan Update 2015******Section for one participating municipality******Plan Monitoring and Evaluation***

In coordination with the regional planning commission and other communities participating in update of the county multi-jurisdictional hazard mitigation plan, the Town's Emergency Management Director will call meetings of all responsible town parties to review plan progress annually on the anniversary of plan adoption and as needed, based on occurrence of hazard events, and report outcomes to the Select Board and regional commission hazard mitigation planning committee. The public will be notified of these meetings in advance through a posting of the agenda at Town Hall. Responsible parties identified for specific mitigation actions will be asked to submit their reports in advance of the meeting. Meetings will entail the following actions:

- Review previous hazard events to discuss and evaluate major issues, effectiveness of current mitigation, and possible mitigation for future events.
- Assess how the mitigation strategies of the plan can be integrated with other Town plans and operational procedures, including the Zoning Bylaw and Emergency Management Plan.
- Review and evaluate progress toward implementation of the current mitigation plan based on reports from responsible parties.
- Amend current plan to improve mitigation practices.

Meetings will involve evaluation and assessment of the plan, regarding its effectiveness at achieving the plan's goals,, stated purpose, and priorities. The following questions will serve as the criteria that is used to evaluate and update the plan:

Plan Mission and Goal

- Is the Plan's stated goal and mission still accurate and up to date, reflecting any changes to local hazard mitigation activities?
- Are there any changes or improvements that can be made to the goal and mission?

Hazard Identification and Risk Assessment

- Have there been any new occurrences of hazard events since the plan was last reviewed? If so, these hazards should be incorporated into the Hazard Identification and Risk Assessment.
- Have any new occurrences of hazards varied from previous occurrences in terms of their extent or impact? If so, the stated impact, extent, probability of future occurrence, or overall assessment of risk and vulnerability should be edited to reflect these changes.

Continued:

Abstract from***Multi-jurisdiction Hazard Mitigation Plan Update 2015****Continued:*

- Is there any new data available from local, state, or Federal sources about the impact of previous hazard events, or any new data for the probability of future occurrences? If so, this information should be incorporated into the plan

Existing Mitigation Strategies

- Are the current strategies effectively mitigating the effect of any recent hazard events?
- Has there been any damage to property since the plan was last reviewed?
- How could the existing mitigation strategies be improved upon to reduce the impact from recent occurrences of hazards?

Proposed Mitigation Strategies

- What progress has been accomplished for each of the previously identified proposed mitigation strategies?
- How have any completed mitigation strategies reduced the Town's vulnerability and impact from hazards that have occurred since the strategy was completed? If not and if they have been tested, what changes need to make them more effective?
- Should the criteria for prioritizing the proposed strategies be altered in any way?
- Should the priority given to individual mitigation strategies be changed, based on any recent changes to financial and staffing resources, or recent hazard events?

Review of the Plan and Integration with Other Planning Documents

- Is the current process for reviewing the Hazard Mitigation Plan effective? How could it be improved?
- Are there any Town plans in the process of being updated that should have the content of this Hazard Mitigation Plan incorporated into them or integrated with other Town planning tools and operational procedures, including the zoning bylaw, the Comprehensive Emergency Management Plan, and the Capital Improvement Plan?

Following these discussions, it is anticipated that the committee may decide to reassign the roles and responsibilities for implementing mitigation strategies to different town departments and/or revise the goals and objectives contained in the plan.

Continued:

Abstract from***Multi-jurisdiction Hazard Mitigation Plan Update 2015****Continued:****Plan Update***

The Emergency Management Director will represent the town on the regional planning commission's hazard mitigation committee in updating the Multi-Jurisdictional Hazard Mitigation Plan every five years, and incorporating the results of the town's plan monitoring and evaluation procedures.

The next anticipated update of the region's plan is scheduled for the year 2020. A first meeting of the regional hazard mitigation committee is anticipated in March 2020. The Emergency Management Director will initiate the town hazard mitigation committee meeting for updating the local plan section in concert with the April 2020 town Emergency Management EOP meeting. The plan update may begin earlier following a significant natural hazard event within the town and region, such as a federally declared disaster.

Once again, 16 public meetings will be held in the Regional Planning Commission's member towns during this process. The public meetings of the regional hazard mitigation committee, those of the town hazard mitigation committee, and related Board of Selectmen meetings shall be publicized through legal notices in local newspapers, posted fliers, and on the town and regional planning commission websites. Written and email comments shall be directed to the EMD. The updated plan will incorporate input from the public, other municipalities and government agencies. The Board of Selectmen is responsible for approving plan submission to FEMA, and for adoption of the multi-jurisdictional plan along with the town section.

The 2020 update will likely follow a similar planning process and outline to The 2015 Plan, making deviations when needed, and will be expanded to better address climate change and possibly man-made hazards. The 2020 Update will also include a section that inventories all progress made, and Local Mitigation Actions and Regional Mitigation Actions accomplished or underway, since the completion of The 2015 Plan. It is the intention of this community and other member towns to implement as many actions, identified in Chapter 5.2, as possible, while The 2015 Plan is active.

A6 Regulatory Guidance

Abstracts from *Code of Federal Regulations and Local Mitigation Plan Review Guidance, October 1, 2011*

Element A6 Regulation [§201.6(c) (4) (i)] (page 14)

[The plan maintenance process shall include a] section describing the method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.

Element Intent (page 17)

To establish a process for jurisdictions to track the progress of the plan's implementation. This also serves as the basis of the next plan update.

Element Requirements (page 17)

- a. The plan **must** identify how, when, and by whom the plan will be monitored. **Monitoring** means tracking the implementation of the plan over time. For example, monitoring may include a system for tracking the status of the identified hazard mitigation actions.
- b. The plan **must** identify how, when, and by whom the plan will be evaluated. **Evaluating** means assessing the effectiveness of the plan at achieving its stated purpose and goals.
- c. The plan **must** identify how, when, and by whom the plan will be updated. **Updating** means reviewing and revising the plan at least once every five years.
- d. The plan **must** include the title of the individual or name of the department/agency responsible for leading each of these efforts.

Check Out These Additional Aids

Local Mitigation Plan Review Guide, October 2011

<http://www.fema.gov/media-library/assets/documents/23194>

Local Mitigation Planning Handbook, March 2013 (pages 7-1 through 7-3)

<http://www.fema.gov/media-library/assets/documents/31598>

Attachment**Mitigation Action Progress Report Form**

Progress Report Period	From Date:	To Date:
Action/Project Title		
Responsible Agency		
Contact Name		
Contact Phone/Email		
Project Status	<input type="checkbox"/> Project completed <input type="checkbox"/> Project canceled <input type="checkbox"/> Project on schedule <input type="checkbox"/> Anticipated completion date: _____ <input type="checkbox"/> Project delayed Explain _____	

Summary of Project Progress for this Report Period

1. What was accomplished for this project during this reporting period?

2. What obstacles, problems, or delays did the project encounter?

3. If uncompleted, is the project still relevant? Should the project be changed or revised?

4. Other comments

Plan Update Evaluation Worksheet

Plan Section	Considerations	Explanation
Planning Process	Should new jurisdictions and/or districts be invited to participate in future plan updates?	
	Have any internal or external agencies been invaluable to the mitigation strategy?	
	Can any procedures (e.g., meeting announcements, plan updates) be done differently or more efficiently?	
	Has the Planning Team undertaken any public outreach activities?	
	How can public participation be improved?	
	Have there been any changes in public support and/or decision-maker priorities related to hazard mitigation?	
Capability Assessment	Have jurisdictions adopted new policies, plans, regulations, or reports that could be incorporated into this plan?	
	Are there different or additional administrative, human, technical, and financial resources available for mitigation planning?	
	Are there different or new education and outreach programs and resources available for mitigation activities?	
	Has NFIP participation changed in the participating jurisdictions?	
Risk Assessment	Has a natural and/or technical or human-caused disaster occurred?	
	Should the list of hazards addressed in the plan be modified?	
	Are there new data sources and/or additional maps and studies available? If so, what are they and what have they revealed? Should the information be incorporated into future plan updates?	
	Do any new critical facilities or infrastructure need to be added to the asset lists?	
	Have any changes in development trends occurred that could create additional risks?	
	Are there repetitive losses and/or severe repetitive losses to document?	

Plan Section	Considerations	Explanation
Mitigation Strategy	Is the mitigation strategy being implemented as anticipated? Were the cost and timeline estimates accurate?	
	Should new mitigation actions be added to the Action Plan? Should existing mitigation actions be revised or eliminated from the plan?	
	Are there new obstacles that were not anticipated in the plan that will need to be considered in the next plan update?	
	Are there new funding sources to consider?	
	Have elements of the plan been incorporated into other planning mechanisms?	
Plan Maintenance Procedures	Was the plan monitored and evaluated as anticipated?	
	What are needed improvements to the procedures?	